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ABSTRACT

This paper provides a description of and rationale for paid educational leave policies in Western Europe by examining three basic categories: general leave provisions provided by law, legal provisions for specific groups, and provisions for educational leave in collective bargaining agreements. Five countries presently have general leave provision: France, Belgium, West Germany, Sweden, and Finland. In Belgium, for example, only employees under 40 years of age who have themselves initiated educational activities outside of work are eligible. In France, the law obliges employers of 10 or more employees to spend 1.1 percent of the total payrolls on further vocational/educational training. Educational leave for specific groups is more widespread. For instance, most Western European countries grant union officials the right to paid time off from work to attend courses relevant to their union functions. Finally, some countries leave the formulation of legal provisions for educational leave to collective bargaining. A 1973 Italian agreement, which views leave as a collective rather than an individual right and which emphasizes leave for the least educated workers, provides the model for subsequent bargaining. The study concludes that progress continues to be made. (PB)

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SCHOOL OF EDUCATION STANFORD UNIVERSITY

Policy Paper No. 83-C3

EDUCATIONAL LEAVE IN EUROPE

Hans G. Schütze

May 1983

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Hans G. Schütze

May 1983

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Abstract

In order to provide opportunities for retraining workers, many countries in Western Europe have adopted policies of paid educational leave. This paper provides a description and rationale for such policies and attempts to acquaint the American reader with their diverse applications in a number of Western European countries. An attempt is made to provide a brief description of each program as well as the recent experiences in implementation.

1. Introduction

Any discussion of paid educational leave policies in Europe must begin with one of the milestones in its development, i.e. the 1974 Convention and Recommendations on Paid Educational Leave adopted by the International Labour Conference (ILO). According to this document, paid educational leave is defined as "leave granted to a worker for educational purposes for a specified period during working hours, with adequate financial entitlements", and countries adopting the convention commit themselves "to formulate and apply a policy designed to promote, by methods appropriate to national conditions and practice and by stages as necessary, the granting of paid educational leave for the purpose of training at any level, general, social and civic education, [as well as] trade union education".

While most, although not all, of the Western European countries have ratified the ILO-Convention, there are important country-specific differences regarding the definition as well as the actual policies and practices of educational leave. Thus, for example, while enterprise-provided further education and training of the workforce is considered as educational leave in Great Britain, this does not qualify as "leave" in the Federal Republic of Germany or in France. Another divergence occurs with respect to "adequate financial entitlements". In several European countries provisions for educational leave are automatically linked to financial support, while in other countries they are not and financial support is provided only for specific groups or for certain kinds of educational activities.

In the following paper, the main provisions for educational leave in Western Europe will be briefly described and then reviewed as to their effects in terms of contents, participation and labour market effects. In view of its brevity, this review, of course, cannot pretend to be comprehensive or exhaustive but rather will attempt to provide the reader with a bird's eye view of the European situation[1].

The Elements of Paid Educational Leave

In order to understand the variety of different schemes and activities to which the label of educational leave has been attached, it might be meaningful to clarify the schemes according to a few basic categories, i.e., as to the general leave provision provided by law, legal provision for specific groups, and provisions for educational leave in collective bargaining agreements. In doing this, one must point out that even such a classification is imprecise as there are a number of schemes which cannot be correctly described by these categories.

Before elaborating on educational leave schemes according to these categories, it is appropriate to mention two leave schemes which are not included in the scope of this overview. The first concerns an established leave scheme which exists in a number of European countries, notably in Germany, Austria and Switzerland. In those countries which have a so-called dual system of initial vocational training, an employer who provides apprenticeship training is obliged by law to release apprentices for vocational school attendance, either 1-2 days per week or in the form of block release. Although this scheme seems to represent a perfect example of educational leave, it does not really qualify as such, given the laws requiring part-time attendance of vocational school, usually up to the age of 18, and thus must instead be considered as part of the provision for compulsory education of young people. Consequently, school attendance under this scheme is seen not as an individual right but rather as a duty.

Educational leave, defined as the individual right of an employed person to take leave for educational purposes, is commonly understood as having two principal components: first, time off work for learning and, second, job security. If we follow this definition, it must be noted that another rather important sector of further training and re-training for adults, one which is often considered as an example for educational leave schemes, is excluded. Most Western European countries also provide full-time or part-time training schemes for the unemployed whose objective is to help the participants get back into employment, where the element of

job security - in the sense of a guarantee to return to the job previously held - is lacking. The same applies to those participants who, under labour market training programmes, re-train either for completely different jobs or train for positions which require higher qualifications. In all of these cases, security in a specific job, and even employment, is not guaranteed at the end of the training programme. Thus, labour market training, although in many respects closely related to educational leave, will not be dealt with in this paper.[2]

2. Provisions for Educational Leave in Western Europe: An Overview.

There are presently five Western European countries with general educational leave legislation, i.e. legal provisions for leave which is not limited to specific populations, groups or those employees holding specific functions in their firms.

France

The best known of these in the U.S. is probably the French Law of 1971 entitled "The Organisation of Continuing Vocational Training within the Framework of Permanent Education". However, as the name indicates, this law is not just a law on educational leave but a provision for the organisation of further vocational training in general, including educational leave. The stated objective is to enable workers to adapt to changes in the techniques and conditions of work, to encourage their social mobility and their own contributions to cultural, economic and social development. The law obliges employers with more than 10 employees to spend a certain percentage of their pay roll on further vocational training (presently 1.1%), regulates the ways in which employers can discharge this financial obligation, and determines the respective roles of the state, the training institutions and the employers in the provision, financing and governance of continuing training.

Concerning their financial obligation as determined by their pay roll, the employers can choose one or combine any of these three main possibilities:

- they can train their employees either on their own premises, or by contracting out to public institutions or private providers of training;

- make payments to so-called training insurance funds which are jointly managed by unions and employers;

- or pay the difference between the amount required by the law and their own outlays for the training of their personnel to the Treasury.

In fact, paid educational leave, i.e. leave for the purpose of education or training undertaken off the employers' premises proper, in other words, training leave taken on the employee's rather than the employer's initiative, plays a minor role in comparison with employer-provided or employer-sponsored training. However, the right to such leave does exist, provided that certain conditions for eligibility are met. For example, an employee must have worked for at least 24 months and at least six of them with his present firm before he is eligible for training leave. The length of such leave must not exceed one year in the case of continous full-time training, or 1.200 hours if the training consists of periodic or part-time courses. The purpose of training leave is defined by the law, namely "to acquire a higher qualification, to change one's work or occupation or to acquire a wider cultural and social outlook." There are certain ceilings fixed by the above such law that the employer can refuse a request for leave, e.g. if more than 2 per cent of a firm's personnel would be on training leave at the same time or, more generally, when the employer claims - and the enterprise council agrees - that the absence of the employee concerned will hamper the efficient running of the firm.

The main reason why educational leave in France has remained marginal in importance is the fact that the right to leave is not directly connected to the right to remuneration. This question, which is of course most important for the effective utilisation of the right to leave, is governed by a complicated and often confusing set of regulations, depending on the accreditation of the training programme, its duration, and the occupational

status of the trainee. If the various pre-conditions are met, the costs for wage maintenance are normally shared between the employers and the state, the exact formula again depending on a number of variables such as the site of the firm and the description and type of the course.[3] It is largely due to these confusing regulations concerning remuneration during the leave and to the complicated procedures required in order to obtain the leave, that the numbers of participants are unimpressive and the trend of participation is in fact on the decline. To illustrate: in 1980 only 37.000 employees (compared to 50.000 in 1979 and 60.000 in 1977) were granted training leave, while the overall number of participants in continuing training courses (provided or sponsored by the enterprise) amounted to 2.9 million during the same year.

Belgium

Another country with a legally established system of educational leave is Belgium which in 1973 established the so-called Law on Credit Hours. Its basic principle holds that eligibility for and the amount of leave entitlement are dependent on previous participation in accredited continuing education and training courses, i.e. credit is accorded to self-initiated educational activities in the form of time off from work. In addition, the entitlement is limited by an age ceiling which provides that only employees under the age of 40 are eligible. Thus, generally speaking, the entitlement is subject to two conditions: first, the employee must meet the age requirement, and second, the amount of leave time depends on previous participation in a recognized education or training course which has been undertaken outside working hours. While eligible courses were initially limited to vocational training only, the provision has been enlarged to include courses in music, literature, the arts and general education including university courses.

The scheme is somewhat larger than it might seem, for even a student enrolled in a first year course can obtain compensation in credit hours equal to 25 per cent of the course he is taking, and an employee who has participated in a course outside working hours for a total of two years is eligible for the necessary time off to complete his course.

As has been stated before, the most important factor affecting the utilization of the entitlement is, of course, the guarantee that time off work is compensated by a concomitant right to remuneration. This is indeed the case in Belgium and the right to leave for educational purposes cannotes the right to a financial recompense during time off work. However, this remuneration is provided at the level of the legal minimum wage which amounts to around 28.000 Belgian Francs per month ($590) and thus entails a significant sacrifice in terms of earnings for most employees.

The financing of the credit hour scheme is administered by a central fund whose source lies in a wage bill levy to which all enterprises are obliged to contribute. Initially, i.e. in 1973, this levy amounted to 0.3 % of the pay roll, but has since been reduced to its present level of 0.03 % - a vivid illustration of both the underutilization of the scheme and the low level of financial assistance.

The afore mentioned loss of income during educational leave is no doubt one of the major reasons for the decline in participation in the credit hour scheme. Thus, in 1979, only around 21.500 employees took advantage of the entitlement (out of some 4 millions dependent employed), as compared to 38.000 participants in 1976. The other principal reason for the law's apparent lack of impact is to be found in its very composition, namely in that it benefits primarily those who have already undertaken serious efforts on their own - both in terms of initiative and sacrifices of their leisure time - to pursue education or training courses outside working hours.

In summary, it is probably fair to say that the present Belgian scheme of credit hours has been marginal in importance - due to a few major faults in the law's design. But it must be mentioned that, as a result of the negative assessment of the scheme, a discussion regarding its reform is presently under way and both employers and trade unions agree that not only the age ceiling must be eliminated but also that the present construct of "credit hours" (i.e. a system of compensation for leisure time sacrificed for education and training) ought to be replaced by a system of general

eligibility for participation in educational and training activities during working time which would operate independently of previous participation in training activities. Of course, the employers favour activities with an emphasis on vocational training and point out that while they are ready to pick up 50 % of the costs of such courses, courses of a general nature such as civic education should be borne by the State.

Germany

In order to discuss the status of paid educational leave in Germany, it is necessary to understand something of the workings of the German system of government. Western Germany is made up of 10 federal states (Länder) and West Berlin which, although possessing of a special status as a result of World War II, has most of the characteristics of a federal state. As in the United States, the federal states have the power to regulate educational matters autonomously, while the Federal Government has very limited jurisdiction in this area.

However, since the Constitution vests the power to legislate on economic and labour market matters to the federal government, it is authorized to pass legislation on educational leave. In the absence of such federal legislation, the states are free to regulate the provision of educational leave and, indeed, since the federal government has backed away from earlier plans to introduce such legislation, general educational leave laws have been passed by five of the federal states, including West Berlin.

These Länder laws are not uniform but have differing features concerning eligibility, the contents of accreditable educational activities and procedures for accreditation. The basic provision, however, is identical in all of the Länder in that the laws give the beneficiaries the right to leave for one working week per year (Berlin: two working weeks) or cumulatively for two working weeks for two consecutive years, during which period the salary or wage is maintained in full by the employer.

Concerning specific features of the Länder laws, only two elements need be mentioned here.[4] Firstly, two of the Länder laws (Berlin and Hesse)

provide for age ceilings limiting eligibility to apprentices and young workers or employees up to age 25. This of course, is a major restriction eliminating the majority of the working population. There are no such restrictions concerning minimum or maximum age in any of the other state laws.

The second point concerns the contents of accreditable educational activities. While in three of the State laws accreditable courses are limited to continuing vocational training and civic education, two of the Länder laws include continuing general education in the range of accreditable activities.

According to the ILO Convention on Paid Educational Leave, it is one of the objectives of such leave to promote "the competent and active participation of workers and their representatives in the life of the undertaking and of the community" [Art. 3(b)]. In Germany the concept of civic education echoes these goals. Although the wording of the definition of civic education in the Länder laws is slightly different, they state essentially the same objective, i.e. to help workers to understand their function, role, obligations and rights, and to enable them to actively participate in social and public life, exercise their rights, and fulfill their functions. Under this definition, trade union education is not separate from, but part of, civic education. In fact, about 50 per cent of the courses and programmes offered under the rubric of civic education are sponsored by the trade unions and those voluntary organizations which have strong links with the unions. The bulk of programmes and courses of continuing education and training, on the other hand, are offered by adult education institutions "Volkshochschulen" - people's Academies sponsored by local government, while other voluntary organizations (like the churches) account for the remainder.

While the objective of continuing vocational training is to maintain, improve or expand vocational qualifications and occupational flexibility, there is no clearly spelled out legal definition of general education in the two State laws which include general education. This occasionally

leads to difficulties when employers refuse to grant educational leave to their employees for general education courses such as full-time language programmes not related to job requirements. Some of the workers concerned have carried their cause to the labour courts which have, in the first instances, ruled that such courses are indeed covered by the term of "general education". While results of these cases are at present pending before the Supreme Labour Court, there is growing resistance among employers against paid leave for what are seen as leisure time activities. It is likely that this resistance will lead to a revision of the law on this point.

Participation in paid educational leave under the Länder laws is in general low (between 2 and 6 %) and of those, approximately 3,75 million eligible workers and employees, only around 87.000 exercised their right in 1980 (i.e. an average of 2.3 %). Thus, even taking into account a slight upward trend over the years, it is fair to say that participation in these schemes has neither lived up to the aspirations of the trade unions who were the driving force behind this legislation, nor warranted the fears of the employers who resisted it, in their concern over the costs and the possible loss of productivity.

It is difficult, if not impossible, to analyse with any degree of accuracy the underlying reasons for this low participation or to assess the relative weight of the factors contributing to it. The trade unions emphasize that continuing resistance on the part of employers and the resultant fear among the workers of negative sanctions, is the most important obstacle to higher levels of participation. Employers, of course, deny that any such sanctions operate. They point out instead that accredited courses and programmes very often do not respond to the real demand which, according to them, is primarily for upgrading occupational skills and knowledge. In particular, employers have strong reservations against what they see as trade union education in the guise of civic education, on the one hand, and leisure activities in the guise of general education on the other.

Apart from this conflict of views, which underlines the polarised and highly political nature of the debate about educational leave in Germany,

there are a number of more objective factors which can be seen to play an important role. Two factors in particular should be singled out. First, there is a widespread lack of suitable courses, i.e. programmes which are tailored both to the needs of workers and employers and which are of the appropriate duration, as the majority of the Länder laws exclude courses shorter than 3 or, in some instances, 5 working days. Secondly, despite the provision for the maintenance of salary, the instruction costs are not borne by the employer and must be met, therefore, either by the participants themselves or by some other sponsors. In addition, there is often a marked lack of information about available courses and the procedure for requesting educational leave. This is particularly true in small enterprises where union influence and worker representation is rather low or else absent altogether.

In summary, the experience of the German laws providing for paid educational leave suggests that this instrument is being widely underutilized owing to a variety of factors. Nevertheless, it must be acknowledged that because of these laws, some 85.000 workers and employees a year utilize the opportunity of undergoing some kind of further education and training. Most of this group have traditionally been under-represented in continuing education and training and it is fair to say that they probably would not have participated without educational leave.

Sweden

Although Sweden has a strong and long-standing tradition of adult education, the legal provisions for general educational leave are relatively recent. They date back to the middle 70's when it became clear that talks between the Swedish Employers' Confederation and the two main trade unions (Confederation of Trade Unions, and the Central Organization of Salaried Employees) would not lead to a general consensus upon which a collective bargaining agreement could be based. It was on January 1, 1975 that a generally applicable law on educational leave came into effect. This law secures the right of all employees, in both the public and private sector, to take leave for educational purposes during working hours.

This law is remarkable for a number of reasons. First, the right to educational leave covers all types of education, i.e. general education, vocational training as well as trade union education. Second, the duration of educational leave is secondly dependent on the length of the course or programme chosen, in other words, the law does not set forth a maximum length of leave. But while the law is thus very generous with respect to the contents of the educational activities for which the leave is granted and on the duration of the leave, it is silent about the financial arrangements. Thus, as in the case of France and in contrast to the legal provisions in Belgium and Germany, the 1975 law provides for educational leave but not for paid educational leave, deflecting the question of financial support to other laws.

Financial assistance to those taking advantage of their right to educational leave can be sought under three different schemes: AMS grants, study assistance and adult study assistance. The first provides for financial assistance to those trainees undergoing labour market training, i.e. unemployed persons or those who are threatened by unemployment - and thus in most cases does not apply to genuine educational leave of absence as defined above. Study assistance is a mixed system of grants and loans for upper secondary and post-secondary students. There is a minimum age requirement which stipulates that upper secondary students must be 20 years of age or older in order to be eligible, and there also an age ceiling which excludes students over 50 years of age from this scheme (except in special cases). The loan portion of the scheme is considerable: between 80 and 90 % of the student support (which amounts to about two thirds of what the average industrial worker earns after taxes) is repayable. In addition to a means test, support under this scheme is also dependent on academic achievement. Loans must be repaid in instalments following a two year period after completion of studies and while there is no regular interest to be paid on the debt, loans are adjusted annually according to an adjustment index which was around 3.3 % per annum in 1980.[5]

The Adult Study Assistance Scheme, introduced in 1976, consists of several sub-schemes targeted at under-educated adults who wish to pursue full-time or part-time education in order to obtain formal educational qualifications corresponding to those conferred by youth education. The Adult Assistance Scheme is financed by a payroll tax of presently 0.25% yielding a total of around 590 million SK in 1980-81 ($80 mil). The various sub-schemes can be broken down into three basic forms of financial assistance for adults: first there exists a special adult study assistance available for prolonged periods of studies, both full-time and half-time, which is primarily awarded for academic studies at the elementary and secondary school level. At the post seondary school level, it can only be awarded to students enrolled in post-secondary vocational education. The main eligibility criterion is four years of previous employment, or comparable social activities (i.e. child rearing), and there is an age ceiling of 45 years, although this is not strictly applied. In 1980-81, there were a total of 15.800 full-time grants under this programme. Secondly, under the Adult Assistance Scheme there is an hourly study assistance payable to persons who participate in study circles and incur loss of earnings as a result. However, hourly assistance is available only for certain kinds of courses, in particular those which correspond to the mian fields of an elementary school curriculum, in addition to trade union education courses for trade union members, and special courses for handicapped persons. Thirdly, there is a daily study assistance which makes it possible to combine study circle courses with short term subject studies at popular academies.[6]

Finland

Finland is the most recent addition to the group of countries with a general educational leave provision provided by law. The law on continuing education which went into effect in January 1980 gives every employed person the right to take up to 9 months of leave during a year period. To be eligible one must be working full-time and have been employed for at least 12 months in the firm at the time of the application for leave. Although the job is guaranteed during the leave, the law does not provide

for wage maintenance through the employer and, in the absence of a state assistance system comparable to the Swedish one, the question is left to be settled directly by employers and unions. Since the law is relatively young, no assessment about the utilization of the leave scheme can be made at this point.

Legal Provision for Educational-Type Leave for Specific Groups

While general educational leave legislation is limited to a few countries, most countries have some legal provision of educational leave for specific populations, groups or employees with particular functions or responsibilities.[7] Most important among these in terms of numbers affected is probably the right of union officials or elected members of enterprise councils to take time off during working hours for courses which prepare them for their tasks relating to these functions. Such a legal right, which is normally granted without full pay, exists in several West European countries, e.g. Germany (where the leave is paid), France, and Sweden (where it is unpaid), but is also often contained in collective bargaining agreements. Comparable rights do exist in some countries for health and security officers in the enterprises. Other examples include the representatives of handicapped employees (Germany), or immigrants who are eligible for up to 240 hours of paid educational leave in order to learn the country's language (Sweden). Many countries have leave provisions for employees in public service, most often for teachers, but also for judges or others. Still, for these groups, participation in continuing education during work time is very often a privilege and not yet an individual right in the sense that it could be successfully claimed or enforced in court if the employer refused to grant it.

Educational Leave in Collective Bargaining Agreements

While there are thus a number of countries with legal provisions for educational leave, some of the West European countries have left this field to the employers and unions to be dealt with by collective bargaining. Most prominent among these is Italy whose "150 hours"-scheme is widely known.

Italy

Although there is no national legislation for general paid educational leave in Italy, there is a 1970 law which must be considered as the forerunner of an educational leave scheme by having provided some of the framework for collective bargaining agreements. The law stipulates the right of workers to time off during working hours and to enroll in recognized courses in primary, secondary and technical schools, thus allowing them to take such courses and sit for examinations. Nothing, however, is said in the law about remuneration during this leave so that this question is left to the bargaining process. A collective agreement between employers and the metal worker's union, struck in 1973, has become a model for basically similar agreements since adopted by other sectors of industry. The two salient, distinguishing features of this agreement are the following.

First the right to leave is conceived as a collective rather than an individual right, because time off during working hours is granted to the workers of a firm as a group. Paid time off for study purposes is thus allotted in a block to the total personnel in form of a fund of available leave hours, the amount of which is calculated as a function of the number of workers employed in the firm. The formula according to which the fund of hours for study leave is calculated is $H = 10 \times 3 \times N$ (where H is the amount of hours, and N the number of workers). Of this total amount of paid time off for study, the individual worker can use a maximum of 150 hours over a three year period - hence the name of the scheme. The leave is granted under the condition that the worker devotes a number of non-work hours to study which is equal to the hours of paid educational leave he receives out of the collective fund. The decision as to who among the workers will profit from the collectively allotted contingent of paid time off for studies, i.e. the distribution of available leave time, lies with the enterprise council rather than the employer.

The second interesting feature of the scheme which makes it distinct from the others discussed above, is that the primary utilisation of the 150 hours scheme occurs in the area of general education among those workers who are underprivileged with respect to previous educational

attainment. In this context it must be mentioned that compulsory school attendance in Italy was raised from 5 years to eight years only in 1963, leaving most of the older workers without a secondary school leaving diploma. Thus, priority is given to compensatory rather than to civic or vocational education, and the main beneficiaries of the scheme have been older workers trying to pass their "licencia media", i.e. the lower secondary school diploma. This licencia media is of particular importance, since it has come to be the prerequisite not only for job opportunities in the public sector but also for participation in most of the qualified vocational training programmes. One of the major problems with the utilisation of the 150 hours scheme for this purpose is that the courses leading to a licencia media require 350 to 400 hours of course work; consequently, workers must use some 250 hours or so of their own time - just for attending the course and not counting the time for individual study and preparation of exams. Nevertheless, participation in these courses has been significant, amounting to around 90 to 100 thousand participants annually.[8]

Great Britain/Germany

There are a number of other European countries in which leave schemes can be found in collective bargaining agreements, although their impact has been relatively minor. Great Britain must be mentioned here since a number of collective agreements on the level of the individual enterprise make reference to leave. On the whole, the picture is highly varigated and confusing although one can generalize to the extent that the granting of educational leave lies at the discretion of the employer and that there is no obligation on his part to maintain wages during attendance of the course or to pay for the costs of the course. When paid educational leave is granted it is generally for the purpose of vocational training but it must be stressed that such leave is not an individual right of the employee; instead it is the employer who selects employees for participation in training courses. In a nutshell, it is fair to say that paid educational leave in the United Kingdom is not yet a recognizable part of training policies - let alone for other educational purposes.[9]

Finally, Germany must again be mentioned since some 200 collective bargaining agreements establish the right to educational leave, though not all of them are paid and the majority are limited to enterprise council members. Eligibility under these schemes overlap to a considerable extent with the legal provisions for paid educational leave which have been discussed above and although the former and the latter are not mutually exclusive in principle, they are mostly in actual practice.[10]

Conclusions

As can be seen from the preceding bird's eye view of the Western European Science concerning educational leave of absence the situation varies considerably from country to country and to attempt a general assessment of the success or failure of the concept of educational leave is thus impossible. However, a few concluding points are in order.

The most obvious is that, while almost all the major Western European countries have some kind of provision for educational leave, the map still reveals some important blank spots (e.g. Denmark, Austria, Switzerland, the Netherlands, Spain, Portugal, Greece). Thus, it is evident that there has been no universal and sweeping movement in all of Europe in favour of educational leave. This should not lead, however, to the assessment that the concept has lost its momentum. Rather, one could say that progress continues to be made, although in a piecemeal manner and by trial and error rather than by a comprehensive blue print or master plan. Thus, for example, the Netherlands have undertaken a serious enquiry into the possibilities of a comprehensive leave scheme and in particular, its financing.[11] Another example is Germany where educational leave legislation is pending in the largest and most prosperous of the federal states (North Rhine-Westfalia, which comprises the heavily industrialized Ruhr area).

There are a number of factors behind this slow development which cannot be dealt with here in depth. Low participation rates for existing schemes, considerable and far reaching changes in the economic situation, unemployment in particular and the fear of loosing one's job, the lack of sufficient financial support, the lack of suitable courses and of outreach

programmes for the under-privileged - all these and other variables operate against educational leave and its efficient utilization. On the other hand, it is undeniable that there is increasing demand and that lifelong learning in a recurrent pattern is more frequently accepted not only as an individual right but as a necessity as technological and social change accelerate, transforming the world in a way that makes constant re-thinking, re-training and continuing learning a pre-requisite for survival.

When trying to assess the actual impact of educational leave in Europe one must admit that any objective judgment is extremely difficult and each view more or less dependent on the author's individual viewpoint. As an instrument of influencing the supply side of the labour market - an important consideration in times of high unemployment - educational leave has so far had only an extremely marginal effect, or none at all. The reasons may be sought in many areas: low overall participation figures, short average leave duration, and the provisions contained in most laws or agreements designed at avoiding a situation whereby too many workers of the same firm use their leave entitlement simultaneously thus obliging the enterprise to hire additional staff.[12] Other factors to be taken into account may be more important but are impossible to quantify; these include the social climate in the enterprise, individual flexibility and employability, and long-term effects on productivity as a result of a higher standard not only of vocational but also general education.[13]

FOOTNOTES

1. For more detailed information, cf. OECD/CERI, Developments of Educational Leave of Absence, Paris 1976 and OECD/CERI, Alternation Between Work and Education. A Study of Educational Leave of Absence at Enterprise Level, Paris 1978.

2. But see von Moltke/von Schneevoigt, Educational Leave for Employees - European Experience for American Consideration, San Francisco (Jossey-Bass) 1977, where these schemes are included in the discussion.

3. For details see P. Caspar, "Training Leave in France," in H. Levin/H.G. Schütze, (eds), Financing Recurrent Education: Strategies for Improving Workers' Skills, Employment and Productivity, Beverly Hills (Sage) 1983 (forthcoming).

4. For further details see H. G. Schütze, "Educational Leave in the Federal Republic of Germany" in: H. Levin / H. G. Schütze (eds), Financing Recurrent Education: Strategies for Improving Workers' Skills, Employment and Productivity, Beverly Hills (SAGE) 1983 (forthcoming).

5. For details see K. Rubenson, "Educational Leave in Sweden," in H. Levin/H. G. Schütze (eds), Financing Recurrent Education: Improving Workers' Skills, Employment and Productivity, Beverly Hills (SAGE) 1983 (forthcoming).

6. This rather complex system of student support makes it very difficult to assess the financial assistance schemes in their effect on utilization of educational leave. But see the detailed discussion by K. Rubenson, loc. cit.

7. Cf. the overview on special leave in ten countries in the European Industrial Relations Review, May 1982, p. 12-17.

8. S. Bruno, "Das System des Bildungsurlaubs in Italien" (Educational Leave in Italy), in: D. Kuhlenkamp/H. G. Schütze (eds), Kosten und Finanzierung der beruflichen und nichtberuflichen Weiterbildung (The Cost and Financing of Continuing Education and Training), Frankfurt (DIESTERWEG) 1982.

9. I. O'Malley, "Paid Educational Leave in Australia, Canada, Ireland and the United Kingdom," in: International Labour Review, vol. 121 (1982) pp. 169-183.

10. Cf. H. G. Schütze, "Paid Educational Leave in Germany," in: Levin/Schütze, op. cit.

11. See e.g. L. Emmerij, "Paid Educational Leave with Particular Emphasis on its Financial Aspects," in Levin/Schütze, op. cit.

12. D. Degen/E. Nuissl, Educational Leave and the Labour Market in Europe, Berlin (European Center for Vocational Training) 1983 (forthcoming).

13. H. Levin/H. G. Schütze, "Economic and Political Dimensions of Recurrent Education," in: Levin/Schütze (eds.), op. cit.